

Message

From: Kleis, Andrew [AKleis@sandiego.gov]
Sent: 9/28/2018 10:32:48 PM
To: Smith, DavidW [Smith.DavidW@epa.gov]
CC: Chris Minton [chrism@lwa.com]; Mumley, Thomas@Waterboards [Thomas.Mumley@waterboards.ca.gov]; Paul Hartman [paulh@lwa.com]
Subject: RE: CASQA Presentation with USEPA
Attachments: DRAFT - CASQA Presentation - Kleis 2018-09-27.pptx

David,

Please see attached PPT for CASQA.

Tom- I look forward to catching up for the presentation, and still very open to adjusting my oral comments after we get a chance to discuss.

Thanks, Drew

From: Kleis, Andrew <AKleis@sandiego.gov>
Sent: Thursday, September 27, 2018 12:23 PM
To: Mumley, Thomas@Waterboards <Thomas.Mumley@waterboards.ca.gov>
Cc: Chris Minton <chrism@lwa.com>; Paul Hartman <paulh@lwa.com>
Subject: RE: CASQA Presentation with USEPA

Tom- Here's a first draft of the City's potential slides. We are still trimming this down, but will give you a sense of what I may cover. Still focusing on the 5 key topics in the email below. Let me know if you have any key changes you recommend.

Thanks, Drew

From: Mumley, Thomas@Waterboards [mailto:Thomas.Mumley@waterboards.ca.gov]
Sent: Friday, September 14, 2018 2:03 PM
To: Kleis, Andrew <AKleis@sandiego.gov>
Cc: Chris Minton <chrism@lwa.com>; Paul Hartman <paulh@lwa.com>
Subject: RE: CASQA Presentation with USEPA

Thanks Drew. I need to and will review the recommendations to determine my top five from the perspective of what I think we (Water Boards) should/can do to improve permits. 1, 2, 3, and 5 are certain candidates for me. I wouldn't pick 4 on my own because bacteria in stormwater is not a priority except in So Cal. That said, I certainly see need for guidance to tame what I consider unrealistic regulatory requirements in So Cal permits.

From: Kleis, Andrew <AKleis@sandiego.gov>
Sent: Friday, September 14, 2018 11:24 AM
To: Mumley, Thomas@Waterboards <thomas.mumley@waterboards.ca.gov>
Cc: Chris Minton <chrism@lwa.com>; Paul Hartman <paulh@lwa.com>
Subject: RE: CASQA Presentation with USEPA

Hi Tom,

Great catching up with you this week. Below are a few thoughts for you describing the City's perspective as you think through your presentation. We've also included the top five recommendations we'd like to focus on. Please let me

know if you concur with this top 5 or recommend any others. I think it'd be great if I presented these as recommendations, and then you could follow with your thoughts on how they could be addressed in future MS4 permits. This is just a first draft; feel free to edit.

If you'd like to set up a call sometime next week, please let me know.

Chris, Paul- thanks for your help.

Thanks, Drew

Overview:

The City has developed an advanced storm water program over four permit cycles to address water quality issues ranging from bacteria impairments, to metals, to sedimentation in local estuaries. As the MS4 Permits have matured, watershed programs have been developed that are focused primarily on TMDLs to target improvements in water quality to the highest priorities. Through long-term watershed planning processes, including the development of comprehensive watershed-based asset management plans, the City has developed schedules and cost estimates for compliance with the TMDLs that present serious financial challenges and potential compliance risks. This is compounded by the City's potential exposure to 3rd Party lawsuits for violations of receiving water limitations. The City is committed to program growth to support improvements in water quality, and as we shift from watershed based planning efforts into an intensive implementation phase, we see the recommendations borne out of the EPA MS4 Permit workshop and their inclusion in future MS4 permitting processes as critical to supporting our programs and implementation efforts moving forward.

Top 5 Recommendations:

1. Advocate for and Build Capacity Related to Stormwater Program Funding (3.1.2)
2. Build Capacity for Asset Management (3.1.4) (include Incentives for Asset Management (3.6.1))
3. Explore Options to Provide Longer Planning Timeframes for Permittees (3.2.4)
4. Establish Clear Guidance on Addressing Elevated Bacteria Levels in Stormwater (3.4.2)
5. Strengthen Incorporation of TMDLs into MS4 Permits (3.8.2)